

SHARON A. URIAS (SBN 016970)
GREENSPOON MARDER LLP
8585 E. Hartford Drive, Suite 700
Scottsdale, AZ 85255
Tel. 480.306.5458
Fax 480.306.5459
Email: azdocket@gmlaw.com
sharon.urias@gmlaw.com

Jeffrey A. Backman (admitted *pro hac vice*)
Roy Taub (admitted *pro hac vice*)
GREENSPOON MARDER LLP
200 East Broward Boulevard, Suite 1800
Ft. Lauderdale, FL 33301
Tel. 954.491.1120
Fax 954.213.0140
Email: jeffrey.backman@gmlaw.com
roy.taub@gmlaw.com
mary.torres@gmlaw.com
cheryl.cochran@gmlaw.com

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Jason Crews,

Plaintiff,

v.

First Family Insurance, LLC and John
Cosgriff,

Defendants.

No. 2:24-cv-00366-CDB

**DEFENDANTS' UNOPPOSED
MOTION FOR EXTENSION
OF TIME TO RESPOND TO
SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1), Defendants First Family Insurance, LLC ("First Family") and John Cosgriff respectfully move this Honorable Court for entry of an order extending their time to respond to Plaintiff's Second Amended Complaint (SAC) by six days,

1 to February 24, 2025, and as grounds supporting this Motion state as follows:

2 1. On May 27, 2024, Plaintiff filed a Motion for Leave to File Second Amended
3 Complaint. *See* Dkt. No. 31.

4 2. By Order dated January 31, 2025, the Court granted Plaintiff leave to file the
5 Second Amended Complaint. Plaintiff filed the Second Amended Complaint on February 1,
6 2025. *See* Dkt. Nos. 40-41.

7 3. Pursuant to Fed. R. Civ. P. 15(a)(3), “any required response to an amended
8 pleading must be made within the time remaining to respond to the original pleading or within
9 14 days after service of the amended pleading, whichever is later.” Thus, in accordance with
10 the rules for computing time under Rule 6(a), Defendants’ deadline to respond to the Second
11 Amended Complaint is February 18, 2025.

12 4. Defendants and their counsel, however, require additional time to prepare and
13 finalize their response to the Second Amended Complaint due to other deadlines and
14 obligations in counsel’s other matters, and time needed for client review. Defendants
15 therefore request a brief extension of six days, up to and including February 24, 2024, to file
16 their response to the Second Amended Complaint.

17 5. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge
18 periods of time for good cause where, as here, the requested extension is made before the
19 deadline. Defendants respectfully submit that the above-stated reasons constitute good cause
20 for the requested extension of time of six days to file a response to the Second Amended
21 Complaint.

22 6. Roy Taub, counsel for Defendants, conferred by e-mail with Plaintiff *Pro Se*
23 regarding the requested extension. Plaintiff advised that he does not oppose the requested
24 extension.

25 7. The requested extension is not sought for dilatory reasons or for any other
26 improper purpose, will not prejudice any party or the Court, and Defendants have not
27 previously sought an extension of this deadline.

28 WHEREFORE, Defendants First Family Insurance, LLC and John Cosgriff

1 respectfully request that the Court enter an order extending their deadline to file a response to
2 Plaintiff Jason Crews's Second Amended Complaint by six days, to February 24, 2025, and
3 for any other relief this Court deems just and appropriate.

4
5 DATED: February 14, 2025

RESPECTFULLY SUBMITTED,
GREENSPOON MARDER LLP

7 /s/ Roy Taub

8 Jeffrey A. Backman (admitted *pro hac vice*)

9 Roy Taub (admitted *pro hac vice*)

200 East Broward Boulevard, Suite 1800

Ft. Lauderdale, FL 33301

10 Tel. 954.491.1120

11 Fax 954.213.0140

jeffrey.backman@gmlaw.com

12 roy.taub@gmlaw.com

13 mary.torres@gmlaw.com

14 cheryl.cochran@gmlaw.com

15 *Attorneys for Defendants*

16 Sharon A. Urias (SBN 016970)

17 8585 E. Hartford Drive, Suite 700

18 Scottsdale, AZ 85255

19 Tel. 602.726.0711

20 Fax 480.306.5459

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants on record, including Plaintiff *Pro Se*.

/s/ Roy Taub

ROY TAUB